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Yucca Mountain Site Characterization Office  
Office of Civilian Radioactive Waste Management  
U.S. Department of Energy  
P.O. Box 30307, Mail Stop 010  
North Las Vegas, NV 89036-0307

Subject: Comments on the Draft Environmental Impact Statement (EIS) for a Geologic Repository for the Disposal of Spent Nuclear Fuel (SNF) and High-Level Radioactive Waste at Yucca Mountain, Nye County, Nevada (DOE/EIS-0250D)

Dear Ms. Dixon:

I have closely followed and provided comment on previous documents concerning the disposition of surplus weapons-grade materials, including Highly Enriched Uranium and Plutonium. The Records of Decision for both of these included conversion and fabrication into reactor fuel with subsequent disposition as SNF. Of course, without a facility to dispose of the SNF, there is not a solution.

In addition, the importance of a life-cycle waste solution to the overall health of the nuclear industry is of utmost importance. A healthy nuclear industry may also contribute to environmental efforts to reduce the nation's carbon dioxide emissions and lessen the impact of global warming.

The difficulty of DOE's response to various, sometimes contradictory, legislation and resulting lawsuits is also appreciated.

I support the Preferred Alternative to proceed with the Proposed Action for 70,000 metric tons of heavy metal as described in section 2.6 of the draft EIS. This is partly because the short-term (about 100 years) impacts are small and the cost of the Proposed Action (\$28.8 billion) is less than that of the No-Action Alternative (\$51.5 to \$56.7 billion).

I am pleased that the draft EIS also considers additional inventory, a retrieval contingency and receipt prior to the start of emplacement. The inclusion of three packaging scenarios, three thermal load scenarios and multiple transportation scenarios, both national and within Nevada is appropriate.

I note that Long term (100 to 10,000 years) impacts also seem to be pretty well bounded but with more uncertainty (e.g. Table 5-3, page 5-22). However, impacts beyond 10,000 years seem to need more study, indeed, DOE is planning additional studies as discussed on page 5-13. I would hope that results would be available for the final EIS. If not, the mitigation measure to delay closure up to 300 years (p. 9-16) is recommended.

Additional specific comments:

1. The repository layout for the low thermal load scenario (Figure 2-16 on page 2-26) has not been adequately addressed in section 3. I suggest that Figures 3-7 and 3-8 (p. 3-22 and 3-23) be modified to include the low thermal load footprint and that additional discussion be added as necessary.

2. The final EIS should show a preference for particular scenarios where multiple scenarios are considered.

3. Since the draft EIS is based on the preliminary design concept, the final EIS, if based on a later design, should state the difference OR state that a Supplemental EIS will be prepared, if the later, more mature design would significantly change the analysis.

4. Page 8-74, 2. incorrectly states that Figure 8-3 (p. 8-11) shows the locations of underground nuclear tests.

5. Page 8-7, bullet 2 has different numbers of waste packages given than in Table 8-34 (p. 8-60).

Please include me on the distribution list for the Final EIS and the Record of Decision.

Sincerely,

Barbara A. Walton

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